



December 22, 2021

SENT VIA FEDERAL EXPRESS

Ms. Sonja Favors
Chief, Industrial Hazardous Waste Branch
Land Division, ADEM
1400 Coliseum Blvd.
Montgomery, Alabama 36110

**RE: Monitoring Well Abandonment Report
 Solutia Inc., Anniston, Alabama
 ADEM Permit #ALD004019048; EPA CERCLA ID #ALD000400123; EPA RCRA
 ID #ALD004019048; Docket No. 1:02-cv-0749-KOB**

Dear Ms. Favors:

On behalf of Solutia Inc. (Solutia), please find enclosed three copies (one hard copy and two electronic copies) of the *Monitoring Well Abandonment Report* for the Solutia facility located at 702 Clydesdale Avenue in Anniston, Alabama. Solutia appreciates the Alabama Department of Environmental Management's efforts to support our post-closure permit management activities. Please feel free to contact me at 256-231-8404 or at egmaco@eastman.com with any comments or questions you may have regarding this document.

Sincerely,

A handwritten signature in blue ink, appearing to read "E. Macolly", is written over a horizontal line.

E. Gayle Macolly
Manager, Remedial Projects
Solutia Inc.

Attachment: Monitoring Well Abandonment Report

cc: Ms. Pamela Langston Scully, USEPA Region IV

MONITORING WELL ABANDONMENT REPORT

Anniston PCB Site
RCRA Post-Closure Permit ALD 004 019 048
Consent Decree Docket No. 1:02-ec-0749-KOB
Anniston, Alabama



Issued: 22 December 2021

**Prepared for: Solutia Inc.
Anniston, Alabama**



GSI Environmental Inc.
2211 Norfolk, Suite 1000, Houston, Texas 77098
713-522-6300

MONITORING WELL ABANDONMENT REPORT

Solutia Inc., Anniston, Alabama
RCRA Post-Closure Permit ALD 004 019 048
Consent Decree Docket No. 1:02-ec-0749-KOB

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Acronyms

ADEM Alabama Department of Environmental Management
bgs below ground surface
ft feet
RCRA Resource Conservation and Recovery Act

MONITORING WELL ABANDONMENT REPORT

Solutia Inc., Anniston, Alabama
RCRA Post-Closure Permit ALD 004 019 048
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1.0 INTRODUCTION

Solutia Inc. maintains an extensive groundwater monitoring well network at the Anniston facility to achieve the following objectives: i) monitor the quality of shallow groundwater beneath the site; ii) track progress of corrective action systems involving groundwater extraction; and iii) evaluate groundwater flow rate and direction. Long-term groundwater monitoring is conducted in accordance with the Resource Conservation and Recovery Act (RCRA) as specified in the RCRA Post-Closure Permit No. 004 019 048. In the RCRA Permit Renewal Application dated 2 May 2018 (Solutia, 2018), Solutia proposed abandonment of 63 of the 137 site monitoring wells that were no longer necessary to achieve the objectives of the groundwater monitoring program. The Alabama Department of Environmental Management (ADEM) concurred with the proposed abandonment plan through renewal of the RCRA Post-Closure Permit that became effective on 19 July 2019 (ADEM, 2019).

This report documents the abandonment of 63 monitoring wells at the facility between June and September 2021. Section 2.0 provides a summary of the standard well abandonment procedures that were implemented. Section 3.0 discusses variances to the standard procedures that were required due to site conditions at certain monitoring wells. Conclusions are provided in Section 4.0 and Section 5.0 lists the cited references. Support documentation including monitoring well abandonment forms, representative site photos, waste disposal records, and variance notice documentation are provided in Appendices A, B, C, and D respectively. Table 1 provides a summary of well abandonment information for each well and the locations of abandoned wells are shown on Figure 1.

2.0 STANDARD WELL ABANDONMENT PROCEDURES

Monitoring well abandonment procedures were developed in accordance with ADEM guidelines (ADEM, 2005; 2017). Drilling and abandonment activities were conducted by an Alabama-licensed drilling contractor (Mr. Joseph Tillman, Alabama License #653 with Environmental Field Services, Inc., Toney, AL) with oversight provided by personnel of GSI Environmental Inc. and Solutia Inc. The following standard procedures were implemented for well abandonment:

- Well completion materials, including concrete surface pads, protective casings, and bollards, were demolished and removed prior to drilling. Debris was placed in drums or roll-off containers pending off-site disposal. A total of approximately 49.3 tons of well material were disposed at Chemical Waste Management (Emelle, AL) under waste profile CM9879 (Anniston PCB Site Consent Decree Waste).

- Monitoring wells were over-drilled to the original boring depth using hollow stem augers that were at least two inches larger than the outer diameter of the well casing. Over-drilling for bedrock wells was performed using air rotary.
- Well materials, including the casing and filter pack, were removed from the ground via the auger string or drill casing. Well materials were placed in roll-off containers pending off-site disposal at Chemical Waste Management (Emelle, AL).
- Boreholes were filled using a cement-bentonite grout mixture consisting of 95% Portland cement and 5% sodium bentonite. A paddle mixer was used to prepare the grout mixture and a positive displacement pump was employed to pump the grout. The tremie method was used to pressure grout the borehole from the bottom of the borehole to approximately 2 feet below ground surface (ft bgs).
- Boreholes were inspected 24 hours to 48 hours after grouting to check for grout settlement. If settlement was observed, grout was added to raise the grout level to approximately 2 ft bgs.
- Boreholes were finished with an approximate 2-ft concrete surface plug.
- Ground surface was repaired to match surrounding elevation and conditions using clean backfill or cement.

The following additional procedures were implemented for monitoring wells with surface isolation casings (i.e., double-cased wells):

- Monitoring well casings and screens were over-drilled as described above; however, the borehole was grouted up to the base of the surface casing instead of to 2 ft bgs.
- The surface casing was then over-drilled, removed from the ground, and pressure grouted to approximately 2 ft bgs using the methodologies described above.
- Boreholes were finished with an approximate 2-ft concrete surface plug.
- Ground surface was repaired to match surrounding elevation and conditions using clean backfill or cement.

Advance approval was obtained from ADEM to grout the surface casings in-place after over-drilling deep monitoring wells with surface isolation casings that were socketed into bedrock. The following procedures were implemented at these wells:

- The surface casings were over-drilled and an attempt to pull the surface casings was made. Both the annular space and the interior space of the surface casing were then pressure grouted to approximately 2 ft bgs using the methodologies described above because the surface casing could not be pulled due to being socketed into bedrock.
- Boreholes were finished with an approximate 2-ft concrete surface plug.
- Ground surface was repaired to match surrounding elevation and conditions using clean backfill or cement.

The standard procedures described above were implemented for abandoning 37 of the 63 monitoring wells. Abandonment of the remaining monitoring wells required some variation from these procedures as further described below in Section 3.0.

3.0 VARIANCES TO STANDARD PROCEDURES

As provided for in the RCRA Permit Application (Solutia, 2018), field conditions were encountered at several wells that required variation from standard procedures to complete well abandonment. The RCRA Permit Application specified notification of ADEM when a variation from these standard operating procedures was required. Notice was provided to ADEM for the monitoring wells requiring variation to the abandonment procedures. Notification consisted of an explanation of the issue and a description of the abandonment procedures to be used (see Appendix D). Summaries of the variations are provided below.

- **OW-11, OW-12, OW-17, Unknown-001:** These 4 monitoring wells were located within the boundary of the high-density polyethylene liner for the South Landfill. To avoid damaging the liner at these locations, the clean soil cover was hand excavated to a depth of approximately 1 foot and the well casing was cutoff above the liner. The remaining well casing was grouted-in-place followed by placement of a concrete plug. Clean soil was replaced to match the surrounding landfill surface elevation.
- **OW-5, OW-16, PZR-05, PZR-06, SBP-03, MW-07:** These 6 monitoring wells were located within the boundary of soil covers associated with the Walking Trail Area and WMA-II. A geotextile marker fabric is present in these areas marking the transition from the soil cover to native soil. At these locations, the clean soil cover was hand excavated down to the geotextile marker prior to over-drilling and the geotextile fabric was cut out over the work area. Following over-drilling, the borehole was grouted to approximately 2 feet below the geotextile marker layer, a 2-ft concrete plug was placed up to elevation of the geotextile marker, the geotextile fabric was replaced, and clean soil was replaced atop the fabric to match the surrounding soil cover elevation.
- **PZ-09:** Upon completing over-drilling to the total depth of 55 ft bgs at this location, 40 feet of auger drill string fell into the borehole. Multiple attempts by the driller to retrieve the drill string were unsuccessful. As such, the drill string was grouted-in-place as part of well abandonment activities.
- **OW-25:** Upon completing over-drilling to the total depth of 35 ft bgs at this location, 10 feet of auger drill string fell into the borehole. An attempt to retrieve the drill string was unsuccessful and the drill string was grouted-in-place as part of well abandonment activities.
- **OWR-2D:** While over-drilling this monitoring well, a subsurface void was encountered between 70 and 75 ft bgs. The issue manifested through loss of cuttings return to the surface and the presence of compressed air escaping to ground surface approximately 10 feet from the borehole. The driller terminated further advancement to avoid seizing the drill string in the borehole by the cuttings. The driller extracted the drill string, then re-entered the borehole to clean out

cuttings from the interval of 40 to 70 ft bgs. The drill string was used to pressure grout the borehole and well casing below 70 ft bgs. A total grout volume of approximately 275 gallons was required to plug the borehole versus a calculated volume of approximately 120 gallons.

- **BR-01, BR-02, BR-03, BR-04, BR-05, DOP-01, OW-25, OWR-01D, OWR-03D, OWR-04D, OWR-05D, OWR-07D, OWR-08S:** These 13 wells were constructed with 10-inch diameter surface isolation casings installed to depths ranging from 10 to 40 feet bgs. The drilling contractor rented 12.5-inch diameter hollow stem augers for over-drilling these casings. Upon attempting to over-drill the first well, it was found the drilling rig was unable to accommodate the augers. As such, the surface casings at these 13 locations were grouted-in-place. Note that well casings and screens at each of these locations were successfully over-drilled and the boreholes were grouted from total depth to the bottom of the surface casings.

4.0 CONCLUSIONS

From June through September 2021, 63 monitoring wells at the Anniston facility were abandoned in accordance with the RCRA Permit Application and ADEM guidelines. The project resulted in a total of approximately 4,346 feet of well abandonment using approximately 9,705 gallons of grout, and producing approximately 49 tons of well material debris that were disposed at Chemical Waste Management in Emelle, AL under waste profile CM9879. Variances associated with the abandonment procedures were generally due to the location of the monitoring well within the boundaries of soil or synthetic cover systems or the presence of large diameter surface casings. These conditions resulted in the well or surface casing being grouted-in-place, or in the case of the wells located within the soil cover system, the placement of the concrete surface plug at the top of the native soil layer (i.e., beneath the soil cover). The variances implemented are not expected to reduce effectiveness of the grout seal or have adverse effects on groundwater quality.

5.0 REFERENCES

- ADEM, 2005. *Guidelines for Well Abandonment*. Groundwater Branch, Alabama Department of Environmental Management.
- ADEM, 2017. *Alabama Environmental Investigation and Remediation Guidance (AEIRG)*. Alabama Department of Environmental Management, Revision 4.0, February 2017.
- ADEM, 2019. *Hazardous Waste Facility Permit*, Solutia Inc., Anniston, Alabama. Alabama Department of Environmental Management, effective 19 July 2019.
- Solutia, 2018. *RCRA Post-Closure Permit Renewal Application*, prepared for Solutia Inc., Anniston, Alabama, prepared by GSI Environmental Inc. 2 May 2018.

WELL ABANDONMENT REPORT

Solutia, Inc., Anniston, Alabama
RCRA Post-Closure Permit ALD 004 019 048
Consent Decree Docket No. 1:02-ec-0749-KOB

TABLES

Table 1	Abandoned Well Details
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TABLE 1
ABANDONED WELL DETAILS

Solutia Inc., Anniston, Alabama
 RCRA Post-Closure Permit No. ALD 004 019 048
 Consent Decree Docket No. 1:02-ec-0749-KOB

Well ID	Latitude	Longitude	Well Type	Well Diameter (inches)	Grout Volume Placed (gallons)	Date Abandoned	Depth to Water (ft btoc)	Total Well Depth (ft bgs)
Observation Wells								
OW-01	33.648089° N	85.853590° W	Residuum	2	70	9/25/2021	7.00	26
OW-05	33.650203° N	85.853111° W	Residuum	4	270	7/15/2021	46.00	65
OW-07	33.651132° N	85.851666° W	Residuum	2	115	7/1/2021	37.84	43
OW-09	33.652715° N	85.852050° W	Residuum	2	110	7/13/2021	9.65	40
OW-11	33.647985° N	85.853077° W	Residuum	2	15	7/14/2021	Dry	14
OW-12	33.647790° N	85.852965° W	Residuum	2	25	7/14/2021	Dry	34.5
OW-13	33.649293° N	85.852046° W	Residuum	4	175	6/13/2021	Dry	43
OW-14	33.649079° N	85.852844° W	Residuum	4	190	7/24/2021	Dry	46
OW-16	33.649925° N	85.852910° W	Residuum	2	80	9/25/2021	29.00	30
OW-17	33.649074° N	85.852226° W	Residuum	2	45	6/28/2021	Dry	40
OW-18	33.653545° N	85.857191° W	Residuum	2	75	6/12/2021	7.00	27.5
OW-20	33.653715° N	85.856823° W	Residuum	2	65	6/14/2021	4.60	23
OW-23	33.653791° N	85.856663° W	Residuum	2	65	6/14/2021	5.56	23
OW-25	33.648625° N	85.853897° W	Residuum	4	90	8/7/2021	9.00	35
Bedrock Wells								
BR-01	33.646122° N	85.852610° W	Bedrock	4	550	9/27/2021	226.50	311
BR-02	33.646152° N	85.854118° W	Bedrock	4	300	9/27/2021	Dry	181
BR-03	33.647523° N	85.854142° W	Bedrock	4	475	9/28/2021	90.00	258
BR-04	33.649156° N	85.854934° W	Bedrock	4	400	9/27/2021	122.89	220
BR-05	33.650593° N	85.857368° W	Bedrock	4	445	9/27/2021	46.10	224

TABLE 1
ABANDONED WELL DETAILS

Solutia Inc., Anniston, Alabama
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 Consent Decree Docket No. 1:02-ec-0749-KOB

Well ID	Latitude	Longitude	Well Type	Well Diameter (inches)	Grout Volume Placed (gallons)	Date Abandoned	Depth to Water (ft btoc)	Total Well Depth (ft bgs)
Site Assessment Wells								
SA-06	33.649377° N	85.848308° W	Residuum	2	130	9/25/2021	6.11	50
SA-22	33.650015° N	85.849971° W	Residuum	2	60	9/24/2021	9.67	24
SA-64	33.654019° N	85.858063° W	Residuum	2	70	7/10/2021	13.00	24
CB-85	33.654221° N	85.853690° W	Residuum	2	110	7/16/2021	13.50	40
Shallow Bedrock Wells								
SBP-01	33.652528° N	85.857883° W	Bedrock	2	240	6/28/2021	74.50	157
SBP-02	33.653268° N	85.856257° W	Bedrock	2	290	9/23/2021	68.30	140
SBP-03	33.654493° N	85.856280° W	Bedrock	2	210	9/26/2021	59.20	102
SBP-04	33.651451° N	85.856517° W	Bedrock	2	255	6/27/2021	54.29	147.5
SBP-05	33.653143° N	85.857724° W	Bedrock	2	415	7/11/2021	73.00	140
West End Landfill Wells								
WEL-02	33.649390° N	85.858734° W	Residuum	2	85	7/22/2021	9.40	31
WEL-03	33.649895° N	85.858530° W	Residuum	2	30	7/23/2021	11.50	32
Monitoring Wells								
MW-01	33.647695° N	85.850634° W	Residuum	4	255	9/24/2021	55.02	62
MW-01A	33.647670° N	85.849551° W	Residuum	2	155	9/23/2021	Dry	56
MW-07	33.654654° N	85.856316° W	Residuum	2	65	7/9/2021	6.00	24
MW-11	33.650324° N	85.849296° W	Residuum	2	90	9/26/2021	7.11	29
MW-12	33.650168° N	85.849723° W	Residuum	2	90	9/26/2021	14.11	28
MW-13	33.649917° N	85.850436° W	Residuum	2	75	9/24/2021	21.30	29

TABLE 1
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Well ID	Latitude	Longitude	Well Type	Well Diameter (inches)	Grout Volume Placed (gallons)	Date Abandoned	Depth to Water (ft btoc)	Total Well Depth (ft bgs)
Piezometers								
PZ-08	33.654120° N	85.855353° W	Residuum	2	75	6/23/2021	24.30	49.9
PZ-09	33.653267° N	85.856573° W	Residuum	2	165	9/20/2021	6.36	55
PZ-10	33.652937° N	85.857538° W	Residuum	2	145	6/24/2021	9.77	55
PZ-11	33.653684° N	85.858258° W	Residuum	2	140	7/7/2021	11.00	50
RFI Piezometers								
PZR-01	33.649167° N	85.852289° W	Residuum	2	160	6/16/2021	50.04	60
PZR-02	33.649291° N	85.852072° W	Residuum	2	180	6/16/2021	51.90	60
PZR-03	33.649329° N	85.851927° W	Residuum	2	170	6/25/2021	53.20	61
PZR-04	33.649379° N	85.851852° W	Residuum	2	165	9/22/2021	57.22	60
PZR-05	33.651192° N	85.852562° W	Residuum	2	125	7/14/2021	9.82	46
PZR-06	33.651102° N	85.852769° W	Residuum	2	30	7/13/2021	8.69	46
Other Wells								
DOP-01	33.654070° N	85.857002° W	Residuum	2	445	9/28/2021	57.42	300
T Wells								
T-05	33.650498° N	85.853346° W	Bedrock	2	220	9/25/2021	88.60	145
RFI Observation Wells								
OWR-01D	33.654820° N	85.853979° W	Residuum	2	175	9/27/2021	40.00	65
OWR-02D	33.652491° N	85.857859° W	Residuum	2	275	7/7/2021	73.91	110
OWR-03D	33.651469° N	85.856578° W	Residuum	2	180	9/26/2021	11.28	65
OWR-04D	33.654226° N	85.856457° W	Residuum	2	180	9/28/2021	61.00	80
OWR-05D	33.649315° N	85.852013° W	Residuum	2	195	9/26/2021	51.40	68
OWR-07D	33.649625° N	85.858611° W	Residuum	2	180	9/27/2021	14.71	65
OWR-08S	33.653302° N	85.857390° W	Residuum	2	105	9/26/2021	12.45	35

TABLE 1
ABANDONED WELL DETAILS

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Well ID	Latitude	Longitude	Well Type	Well Diameter (inches)	Grout Volume Placed (gallons)	Date Abandoned	Depth to Water (ft btoc)	Total Well Depth (ft bgs)
Unknown Wells								
Unknown Ecola Piezometer 002	33.649028° N	85.855528° W	Residuum	2	15	6/25/2021	4.60	4.5
Unknown Ecola Piezometer 003	33.649081° N	85.855366° W	Residuum	2	15	6/25/2021	4.60	3
Unknown Ecola Piezometer 004	33.649981° N	85.855391° W	Residuum	2	10	6/25/2021	2.00	3.5
Unknown Ecola Piezometer 006	33.652068° N	85.856226° W	Residuum	2	5	6/24/2021	Dry	2
Unknown Ecola Piezometer 007	33.652768° N	85.856568° W	Residuum	2	5	6/24/2021	Dry	2
Unknown001	33.648772° N	85.853052° W	Residuum	6	10	6/26/2021	0.17	4
Unknown005	33.651963° N	85.856162° W	Residuum	2	75	6/24/2021	4.20	27
Unknown008	33.653192° N	85.856145° W	Residuum	2	75	6/23/2021	5.71	25

Notes:

- Well locations are shown on Figure 1.
- ft = feet
 btoc = below top of casing
 bgs = below ground surface
- Latitude and Longitude Reported for the North America Datum of 1983 (NAD 1983) global coordinate system.

WELL ABANDONMENT REPORT

Solutia, Inc., Anniston, Alabama
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FIGURES

Figure 1 Abandoned Well Locations

WELL ABANDONMENT REPORT

Solutia, Inc., Anniston, Alabama
RCRA Post-Closure Permit ALD 004 019 048
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APPENDICES

Appendix A	Monitor Well Abandonment Forms
Appendix B	Site Photos
Appendix C	Waste Disposal Records
Appendix D	Variance Notice Documentation

WELL ABANDONMENT REPORT

Solutia, Inc., Anniston, Alabama
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APPENDIX A: MONITOR WELL ABANDONMENT FORMS

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 9/25/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, Al

WELL ID NO. OW-01

WELL LOCATION: South Landfill (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.648089° N Longitude 85.853590° W

DEPTH OF WATER: 7.00 ft btoc DEPTH OF WELL: 26-ft bgs

DIAMETER OF WELL: 2-Inch LENGTH OF SCREEN: 5-ft

SEALING bags cement

MATERIAL: 70 Gallons of Cement/Bentonite grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%
Overdrill to 26-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped with topsoil

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 25th day of the month of September, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 7/15/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave
Anniston, Al

WELL ID NO. OW-05

WELL LOCATION: South East Plant (See Attached Site map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.650203° N Longitude 85.853111° W

DEPTH OF WATER: 46.00 ft btoc DEPTH OF WELL: 65-ft bgs

DIAMETER OF WELL: 4-inch LENGTH OF SCREEN: 5-ft

SEALING bags cement

MATERIAL: 270 Gallons of cement/bentonite grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

Overdrill to 65-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 15th day of the month of July, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 7/01/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave
Anniston, Al

WELL ID NO. OW-7

WELL LOCATION: Northside Property (See Site map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.651132° N Longitude 85.851666° W

DEPTH OF WATER: 37.84 ft btoc DEPTH OF WELL: 43-ft bgs

DIAMETER OF WELL: 2-Inch LENGTH OF SCREEN: 5-ft

SEALING bags cement

MATERIAL: 115 Gallons of Cement/Bentonite Grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: bentonite amount: 5%
Overdrilled to 43-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 1st day of the month of July, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 7/13/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. OW-9

WELL LOCATION: Eastside Properties (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.652715° N Longitude 85.852050° W

DEPTH OF WATER: 9.65 ft btoc DEPTH OF WELL: 40-ft bgs

DIAMETER OF WELL: 2-inch LENGTH OF SCREEN: 5-ft

SEALING bags cement

MATERIAL:
(pound bags): 110 Gallons of Cement/Bentonite Grout

gals of water: _____

yds of sand: _____

OTHER MATERIAL: Bentonite amount: 5%

Overdrill to 40-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped with topsoil

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 13th day of the month of July, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 7/14/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. OW-11

WELL LOCATION: South Landfill (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.647985° N Longitude 85.853077° W

DEPTH OF WATER: DRY DEPTH OF WELL: 14-ft bgs

DIAMETER OF WELL: 2-inch LENGTH OF SCREEN: 5-ft

SEALING bags cement

MATERIAL: 15 gallons of cement/bentonite grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

Grouted in place- Well casing cut BGS

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped with topsoil

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 14th day of the month of July, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 7/14/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. OW-12

WELL LOCATION: South Landfill (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.647790° N Longitude 85.852965° W

DEPTH OF WATER: DRY DEPTH OF WELL: 34.5-ft bgs

DIAMETER OF WELL: 2-inch LENGTH OF SCREEN: 5-ft

SEALING bags cement

MATERIAL: 25 Gallons of Cement/Bentonite Grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%
Abandoned in-place. Well casing cut BGS

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 14th day of the month of July, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 06/13/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. OW-13

WELL LOCATION: South Landfill (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.649293° N Longitude 85.852046° W

DEPTH OF WATER: DRY DEPTH OF WELL: 43-ft bgs

DIAMETER OF WELL: 4-inch LENGTH OF SCREEN: 5-ft

SEALING bags cement

MATERIAL: 175 Gallons of cement/bentonite grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%
Overdrill to 43-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped with topsoil

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 13th day of the month of June, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 07/24/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. OW-14

WELL LOCATION: South Landfill (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.649079° N Longitude 85.852844° W

DEPTH OF WATER: DRY DEPTH OF WELL: 46-ft bgs

DIAMETER OF WELL: 4-inch LENGTH OF SCREEN: 5-ft

SEALING bags cement

MATERIAL:
(pound bags): 190 Gallons of cement/bentonite grout

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

Overdrill to 46-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped with topsoil

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 24th day of the month of July, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 9/25/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. OW-16

WELL LOCATION: South Landfill (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.649925° N Longitude 85.852910° W

DEPTH OF WATER: 29.00 ft btoc DEPTH OF WELL: 30-ft bgs

DIAMETER OF WELL: 2-inch LENGTH OF SCREEN: 5-ft

SEALING bags cement

MATERIAL: 80 Gallons of cement/bentonite grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: Yes FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped with topsoil

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 25th day of the month of September, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 6/28/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. OW-17

WELL LOCATION: South Landfill (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.649074° N Longitude 85.852226° W

DEPTH OF WATER: DRY DEPTH OF WELL: 40-ft bgs

DIAMETER OF WELL: 2-inch LENGTH OF SCREEN: 5-ft

SEALING bags cement

MATERIAL: 45 Gallons of Cement/Bentonite Grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

Abandoned in-place. Well casing cut BGS

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: No - grout in place FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped with topsoil

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 28th day of the month of June, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 6/12/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave
Anniston, AL

WELL ID NO. OW-18

WELL LOCATION: Plant- WMA II East (See Site Map

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.653545° N Longitude 85.857191° W

DEPTH OF WATER: 7.00 ft btoc DEPTH OF WELL: 27.5-ft bgs

DIAMETER OF WELL: 2-inch LENGTH OF SCREEN: 5-ft

SEALING bags cement

MATERIAL: 75 Gallons of Cement/Bentonite Grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%
Overdrill to 27.5-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 12th day of the month of June, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 6/14/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave
Anniston, AL

WELL ID NO. OW-20

WELL LOCATION: Plant- WMA II East (See Site Map

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.653715° N Longitude 85.856823° W

DEPTH OF WATER: 4.60 ft btoc DEPTH OF WELL: 23-ft bgs

DIAMETER OF WELL: 2-inch LENGTH OF SCREEN: 5-ft

SEALING bags cement

MATERIAL: 65 Gallons of cement/bentonite grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

Overdrill to 23-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped with topsoil

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 14th day of the month of June, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 6/14/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. OW-23

WELL LOCATION: Plant- WMA II East (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.653791° N Longitude 85.856663° W

DEPTH OF WATER: 5.56 ft btoc DEPTH OF WELL: 23-ft bgs

DIAMETER OF WELL: 2-inch LENGTH OF SCREEN: 5-ft

SEALING bags cement

MATERIAL:
(pound bags): 65 Gallons of cement/bentonite grout

gals of water: _____

yds of sand: _____

OTHER MATERIAL: Bentonite amount: 5%

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 14th day of the month of June, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 8/7/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. OW-25

WELL LOCATION: South Landfill (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.648625° N Longitude 85.853897° W

DEPTH OF WATER: 9.00 ft btoc DEPTH OF WELL: 35-ft bgs

DIAMETER OF WELL: 4-inch LENGTH OF SCREEN: 5-ft

SEALING bags cement

MATERIAL:
(pound bags): 90 Gallons of Cement/Bentonite Grout

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

Overdrill to 35-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: Cut 3' BGS FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 7th day of the month of August, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 9/27/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, Al 36201

WELL ID NO. BR-01

WELL LOCATION: South Landfill (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.646122° N Longitude 85.852610° W

DEPTH OF WATER: 226.50 ft btoc DEPTH OF WELL: 311-ft bgs

DIAMETER OF WELL: 4" LENGTH OF SCREEN: 20-ft

SEALING bags cement

MATERIAL:
(pound bags): 550 Gallons of Cement/Bentonite Grout

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: N/A

SURFACE CASING REMOVED: Cut 3' BGS FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete with topsoil

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 27th day of the month of September, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/25/21 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 9/27/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, Al

WELL ID NO. BR-02

WELL LOCATION: South Landfill (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.646152° N Longitude 85.854118° W

DEPTH OF WATER: DRY DEPTH OF WELL: 181-ft bgs

DIAMETER OF WELL: 4" LENGTH OF SCREEN: 20-ft

SEALING bags cement

MATERIAL:
(pound bags): 300 Gallons of Cement/Bentonite Grout

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: Cut 3' BGS FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete/ Topsoil

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 27th day of the month of September, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/25/21 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 9/28/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave
Anniston, Al

WELL ID NO. BR-03

WELL LOCATION: South Landfill (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.647523° N Longitude 85.854142° W

DEPTH OF WATER: 90.00 ft btoc DEPTH OF WELL: 258-ft bgs

DIAMETER OF WELL: 4" LENGTH OF SCREEN: 20-ft

SEALING bags cement

MATERIAL:
(pound bags): 475 gallons of Cement/Bentonite Grout

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

Overdrilled to 275-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: Cut 3' BGS FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped with topsoil

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 28th day of the month of September, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 9/27/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, Al

WELL ID NO. BR-04

WELL LOCATION: South East Plant (See Attached Site map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.649156° N Longitude 85.854934° W

DEPTH OF WATER: 122.89 ft btoc DEPTH OF WELL: 220-ft bgs

DIAMETER OF WELL: 4-inch LENGTH OF SCREEN: 20-ft

SEALING bags cement

MATERIAL: 400 Gallons of Cement/Bentonite Grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

Overdrill to 220-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: Cut 3' BGS FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 27th day of the month of September, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 9/27/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave
Anniston, Al

WELL ID NO. BR-05

WELL LOCATION: Plant- WMA II West (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.650593° N Longitude 85.857368° W

DEPTH OF WATER: 46.10 ft btoc DEPTH OF WELL: 224-ft bgs

DIAMETER OF WELL: 4-inch LENGTH OF SCREEN: 20-ft

SEALING bags cement

MATERIAL: 445 Gallons of Cement/Bentonite Grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

Overdrilled to 225-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: Cut 3' BGS FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 27th day of the month of September, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 9/25/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. SA-06

WELL LOCATION: South Landfill (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.649377° N Longitude 85.848308° W

DEPTH OF WATER: 6.11 ft btoc DEPTH OF WELL: 50-ft bgs

DIAMETER OF WELL: 2-inch LENGTH OF SCREEN: 5-ft

SEALING bags cement

MATERIAL: 130 Gallons of Cement/Bentonite Grout
(pound bags): _____

gals of water: _____

yds of sand: _____

OTHER MATERIAL: Bentonite amount: 5%

Overdrilled to 50-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped with topsoil

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 25th day of the month of September, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 9/24/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. SA-22

WELL LOCATION: South Landfill (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.650015° N Longitude 85.849971° W

DEPTH OF WATER: 9.67 ft btoc DEPTH OF WELL: 24-ft bgs

DIAMETER OF WELL: 2-inch LENGTH OF SCREEN: 5-ft

SEALING bags cement

MATERIAL: 60 Gallons of Cement/Bentonite grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

Overdrilled to 24-ft BGS

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped with topsoil

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 24TH day of the month of September, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 7/10/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. SA-64

WELL LOCATION: Northside Property (See Site map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.654019° N Longitude 85.858063° W

DEPTH OF WATER: 13.00 ft btoc DEPTH OF WELL: 24-ft bgs

DIAMETER OF WELL: 2-inch LENGTH OF SCREEN: 5-ft

SEALING bags cement

MATERIAL: 70 Gallons of Cement/Bentonite grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%
Overdrilled to 24-ft BGS

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 10th day of the month of July, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 7/16/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, Al

WELL ID NO. CB-85

WELL LOCATION: NE Corner of Plant (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.654221° N Longitude 85.853690° W

DEPTH OF WATER: 13.50 ft btoc DEPTH OF WELL: 40-ft bgs

DIAMETER OF WELL: 2-Inch LENGTH OF SCREEN: 5-ft

SEALING bags cement

MATERIAL:
(pound bags): 110 Gallons of Cement/Bentonite Grout

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

Overdrill to 40-ft BGS

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: Yes FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped/ Topsoil

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 16th day of the month of July, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 6/28/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. SBP-01

WELL LOCATION: Plant- WMA II West (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.652528° N Longitude 85.857883° W

DEPTH OF WATER: 74.50 ft btoc DEPTH OF WELL: 157-ft bgs

DIAMETER OF WELL: 2-Inch LENGTH OF SCREEN: 15-ft

SEALING bags cement

MATERIAL: 240 Gallons of Cement/Bentonite Grout
(pound bags): _____

gals of water: _____

yds of sand: _____

OTHER MATERIAL: Bentonite amount: 5%

Overdrilled to 157-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes
Cut BGS,

SURFACE CASING REMOVED: grout in place FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 28th day of the month of June, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 9/23/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. SBP-02

WELL LOCATION: Plant- WMA II East (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.653268° N Longitude 85.856257° W

DEPTH OF WATER: 68.30 ft btoc DEPTH OF WELL: 140-ft bgs

DIAMETER OF WELL: 2-inch LENGTH OF SCREEN: 15-ft

SEALING bags cement

MATERIAL:
(pound bags): 290 Gallons of cement/bentonite grout

gals of water: _____

yds of sand: _____

OTHER MATERIAL: Bentonite amount: 5%

Overdrilled to 140-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

Cut BGS,

SURFACE CASING REMOVED: grout in place FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 23rd day of the month of September, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 9/26/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. SBP-03

WELL LOCATION: Northside Property (See Site map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.654493° N Longitude 85.856280° W

DEPTH OF WATER: 59.20 ft btoc DEPTH OF WELL: 102-ft bgs

DIAMETER OF WELL: 2-Inch LENGTH OF SCREEN: 10-ft

SEALING bags cement

MATERIAL:
(pound bags): 210 Gallons of Cement/Bentonite Grout

gals of water: _____

yds of sand: _____

OTHER MATERIAL: Bentonite amount: 5%

Overdrill to 102-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

Cut BGS,

SURFACE CASING REMOVED: grout in place FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 26th day of the month of September, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 6/27/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave
Anniston, AL

WELL ID NO. SBP-04

WELL LOCATION: Plant- WMA II East (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.651451° N Longitude 85.856517° W

DEPTH OF WATER: 54.29 ft btoc DEPTH OF WELL: 147.5-ft bgs

DIAMETER OF WELL: 2-Inch LENGTH OF SCREEN: 15-ft

SEALING bags cement

MATERIAL: 255 Gallons of Cement/Bentonite Grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

Overdrilled to 147.5-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes
Cut BGS,

SURFACE CASING REMOVED: grout in place FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 27th day of the month of June, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 7/11/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. SBP-05

WELL LOCATION: Plant- WMA II East (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.653143° N Longitude 85.857724° W

DEPTH OF WATER: 73.00 ft btoc DEPTH OF WELL: 140-ft bgs

DIAMETER OF WELL: 2-Inch LENGTH OF SCREEN: 10-ft

SEALING bags cement

MATERIAL: 415 Gallons of Cement/Bentonite Grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

Overdrilled to 140-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

Cut BGS,
SURFACE CASING REMOVED: grout in place FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 11th day of the month of July, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 7/22/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. WEL-02

WELL LOCATION: West End Landfill (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.649390° N Longitude 85.858734° W

DEPTH OF WATER: 9.40 ft btoc DEPTH OF WELL: 31-ft bgs

DIAMETER OF WELL: 2-Inch LENGTH OF SCREEN: 10-ft

SEALING bags cement

MATERIAL: 85 Gallons of Cement/Bentonite Grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

Overdrilled to 31-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete Capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 22nd day of the month of July, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 7/23/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. WEL-03

WELL LOCATION: West End Landfill (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.649895° N Longitude 85.858530° W

DEPTH OF WATER: 11.50 ft btoc DEPTH OF WELL: 32-ft bgs

DIAMETER OF WELL: 2-Inch LENGTH OF SCREEN: 10-ft

SEALING bags cement
MATERIAL: 30 Gallons of cement/bentonite grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

Overdrilled to 32-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete Capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 23rd day of the month of July, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 09/24/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, Al

WELL ID NO. MW-01

WELL LOCATION: South Landfill (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.647695° N Longitude 85.850634° W

DEPTH OF WATER: 55.02 ft btoc DEPTH OF WELL: 62-ft bgs

DIAMETER OF WELL: 4-inch LENGTH OF SCREEN: 10-ft

SEALING bags cement

MATERIAL: 255 Gallons of Cement/Bentonite Grout
(pound bags): _____

gals of water: _____

yds of sand: _____

OTHER MATERIAL: Bentonite amount: 5%
Overdrill to 62-ft BGS

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 24th day of the month of September, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 9/23/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, Al

WELL ID NO. MW-01A

WELL LOCATION: South Landfill (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.647670° N Longitude 85.849551° W

DEPTH OF WATER: DRY DEPTH OF WELL: 56-ft bgs

DIAMETER OF WELL: 2-Inch LENGTH OF SCREEN: 5-ft

SEALING bags cement

MATERIAL: 155 Gallons of Cement/Bentonite Grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%
Overdrill to 56-ft BGS

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 23rd day of the month of September, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 7/9/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, Al

WELL ID NO. MW-07

WELL LOCATION: Northside Property (See Site map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.654654° N Longitude 85.856316° W

DEPTH OF WATER: 6.00 ft btoc DEPTH OF WELL: 24-ft bgs

DIAMETER OF WELL: 2-Inch LENGTH OF SCREEN: 5-ft

SEALING bags cement

MATERIAL:
(pound bags): 65 Gallons of Cement/Bentonite Grout

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 9th day of the month of July, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 09/26/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, Al

WELL ID NO. MW-11

WELL LOCATION: South Landfill (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.650324° N Longitude 85.849296° W

DEPTH OF WATER: 7.11 ft btoc DEPTH OF WELL: 29-ft bgs

DIAMETER OF WELL: 2-Inch LENGTH OF SCREEN: 5-ft

SEALING bags cement

MATERIAL: 90 Gallons of Cement/Bentonite Grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped with topsoil

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 26th day of the month of September, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 9/26/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, Al

WELL ID NO. MW-12

WELL LOCATION: South Landfill (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.650168° N Longitude 85.849723° W

DEPTH OF WATER: 14.11 ft btoc DEPTH OF WELL: 28-ft bgs

DIAMETER OF WELL: 2-inch LENGTH OF SCREEN: 5-ft

SEALING bags cement

MATERIAL: 90 Gallons of Cement/Bentonite Grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

Overdrill to 28-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped with topsoil

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 26th day of the month of September, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 9/24/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, Al

WELL ID NO. MW-13

WELL LOCATION: South Landfill (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.649917° N Longitude 85.850436° W

DEPTH OF WATER: 21.30 ft btoc DEPTH OF WELL: 29-ft bgs

DIAMETER OF WELL: 2-Inch LENGTH OF SCREEN: 5-ft

SEALING bags cement

MATERIAL: 75 Gallons of Cement/Bentonite Grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

Overdrill to 29-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped with topsoil

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 24th day of the month of September, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 4302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 06/23/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. PZ-08

WELL LOCATION: Plant- WMA II East (See Site Map

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.654120° N Longitude 85.855353° W

DEPTH OF WATER: 24.30 ft btoc DEPTH OF WELL: 49.9-ft bgs

DIAMETER OF WELL: 2-inch LENGTH OF SCREEN: 5-ft

SEALING bags cement

MATERIAL: 75 Gallons of Cement/Bentonite Grout
(pound bags): _____

gals of water: _____

yds of sand: _____

OTHER MATERIAL: Bentonite amount: 5%

Overdrill to 49.9-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 23rd day of the month of June, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 9/20/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. PZ-09

WELL LOCATION: Plant- WMA II East (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.653267° N Longitude 85.856573° W

DEPTH OF WATER: 6.36 ft btoc DEPTH OF WELL: 55-ft bgs

DIAMETER OF WELL: 2-inch LENGTH OF SCREEN: 5-ft

SEALING bags cement

MATERIAL: 165 Gallons of Cement/Bentonite Grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

Overdrill to 55-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 20th day of the month of September, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 6/24/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. PZ-10

WELL LOCATION: Plant- WMA II West (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.652937° N Longitude 85.857538° W

DEPTH OF WATER: 9.77 ft btoc DEPTH OF WELL: 55-ft bgs

DIAMETER OF WELL: 2-inch LENGTH OF SCREEN: 5-ft

SEALING bags cement

MATERIAL: 145 Gallons of Cement/Bentonite Grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

Overdrill to 55-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 24th day of the month of June, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 07/07/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. PZ-11

WELL LOCATION: Northside Property (See Site map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.653684° N Longitude 85.858258° W

DEPTH OF WATER: 11.00 ft btoc DEPTH OF WELL: 50-ft bgs

DIAMETER OF WELL: 2-inch LENGTH OF SCREEN: 5-ft

SEALING bags cement

MATERIAL: 140 Gallons of Cement/Bentonite Grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

Overdrilled to 50-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 7th day of the month of July, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 6/16/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. PZR-01

WELL LOCATION: South Landfill (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.649167° N Longitude 85.852289° W

DEPTH OF WATER: 50.04 ft btoc DEPTH OF WELL: 60-ft bgs

DIAMETER OF WELL: 2 LENGTH OF SCREEN: 20-ft

SEALING bags cement

MATERIAL: 160 Gallons of Cement/Bentonite grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%
Overdrill to 60-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 16th day of the month of June, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 06/16/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. PZR-02

WELL LOCATION: South Landfill (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.649291° N Longitude 85.852072° W

DEPTH OF WATER: 51.90 ft btoc DEPTH OF WELL: 60-ft bgs

DIAMETER OF WELL: 2-inch LENGTH OF SCREEN: 20-ft

SEALING bags cement

MATERIAL: 180 Gallons of cement/bentonite grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

Overdrilled to 60-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped with topsoil

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 16th day of the month of June, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 6/25/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. PZR-03

WELL LOCATION: South Landfill (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.649329° N Longitude 85.851927° W

DEPTH OF WATER: 53.20 ft btoc DEPTH OF WELL: 61-ft bgs

DIAMETER OF WELL: 2-inch LENGTH OF SCREEN: 20-ft

SEALING bags cement

MATERIAL: 170 Gallons of Cement/Bentonite Grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

Overdrilled 61-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped with topsoil

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 25th day of the month of June, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 9/22/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. PZR-04

WELL LOCATION: South Landfill (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.649379° N Longitude 85.851852° W

DEPTH OF WATER: 57.22 ft btoc DEPTH OF WELL: 60-ft bgs

DIAMETER OF WELL: 2-inch LENGTH OF SCREEN: 20-ft

SEALING bags cement

MATERIAL: 165 Gallons of Cement/Bentonite Grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

Overdrilled to 60-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 22nd day of the month of September, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 7/14/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. PZR-05

WELL LOCATION: South East Plant (See Attached Site map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.651192° N Longitude 85.852562° W

DEPTH OF WATER: 9.82 ft btoc DEPTH OF WELL: 46-ft bgs

DIAMETER OF WELL: 2-inch LENGTH OF SCREEN: 20-ft

SEALING bags cement

MATERIAL: 125 Gallons of Cement/Bentonite Grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

Overdrilled to 46-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped with topsoil

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 14th day of the month of July, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 7/13/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. PZR-06

WELL LOCATION: South East Plant (See Attached Site map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.651102° N Longitude 85.852769° W

DEPTH OF WATER: 8.69 ft btoc DEPTH OF WELL: 46-ft bgs

DIAMETER OF WELL: 2-inch LENGTH OF SCREEN: 20-ft

SEALING bags cement

MATERIAL: 30 Gallons of cement/bentonite grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

Overdrilled to 46-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped with topsoil

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 13th day of the month of July, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 09/28/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, Al

WELL ID NO. DOP-01

WELL LOCATION: Northside Property (See Site map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.654070° N Longitude 85.857002° W

DEPTH OF WATER: 57.42 ft btoc DEPTH OF WELL: 300-ft bgs

DIAMETER OF WELL: 2-inch LENGTH OF SCREEN: 25-ft

SEALING bags cement

MATERIAL:
(pound bags): 445 Gallons of Cement/Bentonite Grout

gals of water: _____

yds of sand: _____

OTHER MATERIAL: Bentonite amount: 5%
Overdrilled to 300-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: Cut 3' BGS FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 28th day of the month of September, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 09/25/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. T-05

WELL LOCATION: South East Plant (See Attached Site map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.650498° N Longitude 85.853346° W

DEPTH OF WATER: 88.60 ft btoc DEPTH OF WELL: 145-ft bgs

DIAMETER OF WELL: 2-Inch LENGTH OF SCREEN: 10-ft

SEALING bags cement

MATERIAL: 220 Gallons of Cement/Bentonite Grout
(pound bags): _____

gals of water: _____

yds of sand: _____

OTHER MATERIAL: Bentonite amount: 5%

Overdrilled to 145-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: Yes FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 25th day of the month of September, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 9/27/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. OWR-01D

WELL LOCATION: Plant- WMA II East (See Site Map

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.654820° N Longitude 85.853979° W

DEPTH OF WATER: 40.00 ft btoc DEPTH OF WELL: 65-ft bgs

DIAMETER OF WELL: 2-inch LENGTH OF SCREEN: 10-ft

SEALING bags cement

MATERIAL: 175 Gallons of cement/bentonite grout
(pound bags): _____

gals of water: _____

yds of sand: _____

OTHER MATERIAL: Bentonite amount: 5%

Overdrilled to 65-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: Cut 3' BGS FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 27th day of the month of September, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 07/07/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. OWR-02D

WELL LOCATION: Plant- WMA II West (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.652491° N Longitude 85.857859° W

DEPTH OF WATER: 73.91 ft btoc DEPTH OF WELL: 110-ft bgs

DIAMETER OF WELL: 2-inch LENGTH OF SCREEN: 10-ft

SEALING bags cement

MATERIAL: 275 Gallons of Cement/Bentonite Grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%
Overdrilled to 75-ft BGS- Loss of return. trip out and grout in-place

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: Cut BGS FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 7th day of the month of July, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 09/26/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. OWR-03D

WELL LOCATION: Plant- WMA II East (See Site Map

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.651469° N Longitude 85.856578° W

DEPTH OF WATER: 11.28 ft btoc DEPTH OF WELL: 65-ft bgs

DIAMETER OF WELL: 2-Inch LENGTH OF SCREEN: 10-ft

SEALING bags cement

MATERIAL: 180 Gallons of Cement/Bentonite Grout
(pound bags): _____

gals of water: _____

yds of sand: _____

OTHER MATERIAL: Bentonite amount: 5%
Overdrill to 65-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: Cut 3' BGS FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 26th day of the month of September, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 9/28/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. OWR-04D

WELL LOCATION: Northside Property (See Site map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.654226° N Longitude 85.856457° W

DEPTH OF WATER: 61.00 ft btoc DEPTH OF WELL: 80-ft bgs

DIAMETER OF WELL: 2-inch LENGTH OF SCREEN: 10-ft

SEALING bags cement

MATERIAL: 180 Gallons of Cement/Bentonite Grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%
Overdrilled to 80-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: Cut 3' BGS FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 28th day of the month of September, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 09/26/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. OWR-05D

WELL LOCATION: South Landfill (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.649315° N Longitude 85.852013° W

DEPTH OF WATER: 51.40 ft btoc DEPTH OF WELL: 68-ft bgs

DIAMETER OF WELL: 2-inch LENGTH OF SCREEN: 10-ft

SEALING bags cement

MATERIAL: 195 Gallons of Cement/Bentonite Grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%
Overdrill to 68-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: Cut 3' BGS FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped with topsoil

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 26th day of the month of September, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 09/27/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. OWR-07D

WELL LOCATION: West End Landfill (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.649625° N Longitude 85.858611° W

DEPTH OF WATER: 14.71 ft btoc DEPTH OF WELL: 65-ft bgs

DIAMETER OF WELL: 2-inch LENGTH OF SCREEN: 10-ft

SEALING bags cement

MATERIAL: 180 Gallons of cement/bentonite grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

Overdrilled to 65-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: Cut 3' BGS FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 27th day of the month of September, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 9/26/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. OWR-8S

WELL LOCATION: Plant- WMA II West (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.653302° N Longitude 85.857390° W

DEPTH OF WATER: 12.45 ft btoc DEPTH OF WELL: 35-ft bgs

DIAMETER OF WELL: 2-inch LENGTH OF SCREEN: 10-ft

SEALING bags cement

MATERIAL:
(pound bags): 105 Gallons of Cement/Bentonite Grout

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

Overdrilled to 35-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: Yes

SURFACE CASING REMOVED: Cut 3' BGS FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 26th day of the month of September, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 6/25/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. Unknown Ecola Piezometer 002

WELL LOCATION: South East Plant (See Attached Site map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.649028° N Longitude 85.855528° W

DEPTH OF WATER: 4.60 ft btoc DEPTH OF WELL: 4.5-ft bgs

DIAMETER OF WELL: 2-Inch LENGTH OF SCREEN: Unknown

SEALING bags cement

MATERIAL:
(pound bags): 15 Gallons of Cement/Bentonite Grout

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%
Overdrilled to 4.5-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: N/A

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 25th day of the month of June, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 6/25/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. Unknown Ecola Piezometer 003

WELL LOCATION: South East Plant (See Attached Site map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.649081° N Longitude 85.855366° W

DEPTH OF WATER: 4.60 ft btoc DEPTH OF WELL: 3-ft bgs

DIAMETER OF WELL: 2-Inch LENGTH OF SCREEN: Unknown

SEALING bags cement

MATERIAL: 15 Gallons of Cement/Bentonite Grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

Overdrilled to 3-ft bgs

CONCRETE PAD REMOVED: N/A PROTECTIVE POSTS REMOVED: N/A

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 25th day of the month of June, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 6/25/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. Unknown Ecola Piezometer 004

WELL LOCATION: South East Plant (See Attached Site map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.649981° N Longitude 85.855391° W

DEPTH OF WATER: 2.00 ft btoc DEPTH OF WELL: 3.5-ft bgs

DIAMETER OF WELL: 2 LENGTH OF SCREEN: Unknown

SEALING bags cement

MATERIAL: 10 Gallons of Cement/Bentonite Grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

Overdrilled to 3.5-ft bgs

CONCRETE PAD REMOVED: N/A PROTECTIVE POSTS REMOVED: N/A

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 25th day of the month of June, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 06/24/21

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. Unknown Ecola Piezometer 006

WELL LOCATION: South East Plant (See Attached Site map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.652068° N Longitude 85.856226° W

DEPTH OF WATER: DRY DEPTH OF WELL: 2-ft bgs

DIAMETER OF WELL: N/A LENGTH OF SCREEN: Unknown

SEALING bags cement

MATERIAL: 5 Gallons of Cement/Bentonite Grout
(pound bags): _____

gals of water: _____

yds of sand: _____

OTHER MATERIAL: Bentonite amount: 5%

Overdrilled to 2-ft bgs

CONCRETE PAD REMOVED: N/A PROTECTIVE POSTS REMOVED: N/A

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 24th day of the month of June, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 6/24/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. Unknown Ecola Piezometer 007

WELL LOCATION: South East Plant (See Attached Site map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.652768° N Longitude 85.856568° W

DEPTH OF WATER: DRY DEPTH OF WELL: 2-ft bgs

DIAMETER OF WELL: 2-Inch LENGTH OF SCREEN: Unknown

SEALING bags cement

MATERIAL: 5 Gallons of Cement/Bentonite Grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

Overdrilled to 2-ft bgs

CONCRETE PAD REMOVED: N/A PROTECTIVE POSTS REMOVED: N/A

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 24th day of the month of June, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 6/26/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. Unknown001

WELL LOCATION: South Landfill (See Site Map)

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.648772° N Longitude 85.853052° W

DEPTH OF WATER: 0.17 ft btoc DEPTH OF WELL: 4-ft bgs

DIAMETER OF WELL: 6-Inch LENGTH OF SCREEN: Unknown

SEALING bags cement

MATERIAL: 10 Gallons of Cement/Bentonite Grout
(pound bags):

gals of water:

yds of sand:

OTHER MATERIAL: Bentonite amount: 5%

Abandoned in place- cut well casing BGS

CONCRETE PAD REMOVED: N/A PROTECTIVE POSTS REMOVED: N/A

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 26th day of the month of June, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 6/24/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. Unknown005

WELL LOCATION: Plant- WMA II East (See Site Map

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.651963° N Longitude 85.856162° W

DEPTH OF WATER: 4.20 ft btoc DEPTH OF WELL: 27-ft bgs

DIAMETER OF WELL: 2-Inch LENGTH OF SCREEN: Unknown

SEALING bags cement

MATERIAL:
(pound bags): 75 Gallons of Cement/Bentonite Grout

gals of water: _____

yds of sand: _____

OTHER MATERIAL: Bentonite amount: 5%

Overdrilled to 27-ft bgs

CONCRETE PAD REMOVED: Yes PROTECTIVE POSTS REMOVED: N/A

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 24th day of the month of June, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

MONITOR WELL ABANDONMENT FORM

DATE OF ABANDONMENT 6/23/2021

SITE NAME: Solutia, Inc (Eastman Chemical)

SITE ADDRESS: 702 Clydesdale Ave

Anniston, AL

WELL ID NO. Unknown008

WELL LOCATION: Plant- WMA II East (See Site Map

USGS Topographic Map 7.5-minute map for Anniston, AL 2020

Latitude 33.653192° N Longitude 85.856145° W

DEPTH OF WATER: 5.71 ft btoc DEPTH OF WELL: 25-ft bgs

DIAMETER OF WELL: 2-inch LENGTH OF SCREEN: Unknown

SEALING bags cement

MATERIAL:
(pound bags): 75 Gallons of Cement/Bentonite Grout

gals of water: _____

yds of sand: _____

OTHER MATERIAL: Bentonite amount: 5%

Overdrilled to 25-ft bgs

CONCRETE PAD REMOVED: N/A PROTECTIVE POSTS REMOVED: N/A

SURFACE CASING REMOVED: N/A FLUSH MOUNT REMOVED: N/A

SURFACE COMPLETION (after abandonment): Concrete Capped

CERTIFICATION: I hereby certify that this well abandonment record is true and exact, and was accomplished on 23rd day of the month of June, 2021, with my active participation and that I am qualified to participate in such abandonment actions.

Signature of Responsible Participant: Joseph Tillman AL Driller License #653

Date: 10/26/2021 Address: 1302 North Meridian Street, Suite 310
Indianapolis, IN 46202

WELL ABANDONMENT REPORT

Solutia, Inc., Anniston, Alabama
RCRA Post-Closure Permit ALD 004 019 048
Consent Decree Docket No. 1:02-ec-0749-KOB

APPENDIX B: SITE PHOTOS

SITE PHOTOS
WELL ABANDONMENT REPORT

Solutia, Inc., Anniston, Alabama
RCRA Post-Closure Permit ALD 004 019 048
Consent Decree Docket No. 1:02-ec-0749-KOB



Date: 8 June 2021

Description: Photo taken soon before decommissioning activities began at well SBP-02.



Date: 8 June 2021

Description: Photo taken soon before decommissioning activities began at well PZ-09.



Date: 9 June 2021

Description: Jackhammer mounted on a backhoe loader being used to demolish the surface completion at well OW-18 prior to overdrilling.



Date: 9 June 2021

Description: Jackhammer mounted on a backhoe loader being used to demolish the surface completion at well OW-20 prior to overdrilling.



Date: 10 June 2021
Description: Geoprobe set up at OW-18.



Date: 11 June 2021
Description: Geoprobe starting to overdrill at OW-23



Date: 25 June 2021
Description: OW-17 prior to decommissioning.



Date: 12 July 2021
Description: SBP-03 double casing just before drilling out the inside of surface casing.



Date: 12 July 2021
Description: Digging down to geosynthetic liner at MW-07.



Date: 12 July 2021

Description: Surface casing at SBP-03 both drilled out and overdrilled where geosynthetic liner was present.



Date: 12 July 2021
Description: CME preparing to overdrill at PZR-02.



Date: 14 July 2021
Description: T-05 prior to decommissioning activities.



Date: 20 July 2021
Description: PZR-06 prior to decommissioning activities.



Date: 26 July 2021
Description: CME drilling at OWR-02D where void issue was encountered.



Date: 26 July 2021
Description: CME drilling at OWR-02D where void issue was encountered.



Date: 29 July 2021

Description: Surface casing after drilling out inside and then overdrilling at SBP-04.



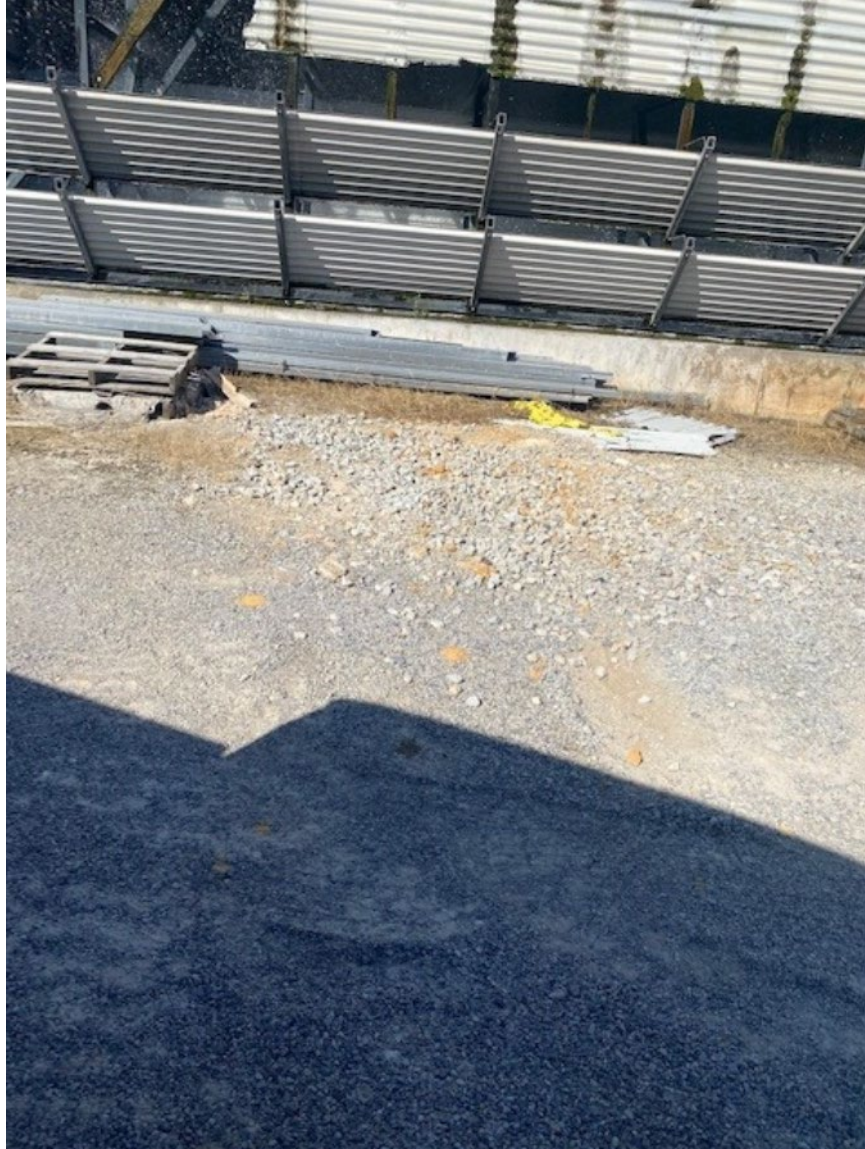
Date: 30 July 2021
Description: Geoprobe attempting to retrieve lost augers at PZ-09.



Date: 3 August 2021
Description: CME drilling at BR-02.



Date: 27 September 2021
Description: Completion of PZ-09.



Date: 27 September 2021
Description: Completion of T-05.



Date: 27 September 2021
Description: Completion of OW-16.



Date: 28 September 2021
Description: Completion of PZ-08.



Date: 28 September 2021
Description: Completion of BR-04.



Date: 28 September 2021
Description: Completion of OW-05.



Date: 28 September 2021
Description: Completion of PZR-06.



Date: 28 September 2021
Description: Completion of PZR-05.



Date: 28 September 2021
Description: Completion of OWR-03D and SBP-04.



Date: 28 September 2021
Description: Completion of BR-05.



Date: 28 September 2021
Description: Completion of OWR-02D and SBP-01.



Date: 28 September 2021
Description: Completion of SBP-05.



Date: 28 September 2021
Description: Completion of OWR-08S.



Date: 28 September 2021
Description: Completion of PZ-10.



Date: 28 September 2021
Description: Completion of SBP-02.

WELL ABANDONMENT REPORT


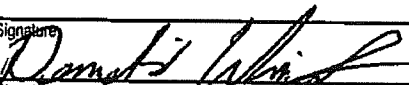
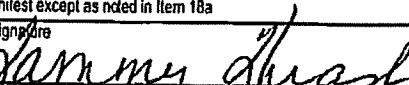
Solutia, Inc., Anniston, Alabama
RCRA Post-Closure Permit ALD 004 019 048
Consent Decree Docket No. 1:02-ec-0749-KOB

APPENDIX C: WASTE DISPOSAL RECORDS

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Box # 25323 / Trailer # 487

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number ALD 004019048		2. Page 1 of 1		3. Emergency Response Phone (800) 424-8300		4. Manifest Tracking Number 003693645 GBF		
5. Generator's Name and Mailing Address Sokuria, Inc. 702, Chaddsdele Ave. ANNISTON, AL 36201-5328						Generator's Site Address (if different than mailing address)				
Generator's Phone: (256) 231-8400										
6. Transporter 1 Company Name Robbie D. Wood, Inc.						U.S. EPA ID Number ALD 067138891				
7. Transporter 2 Company Name						U.S. EPA ID Number				
8. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. HIGHWAY 17 NORTH, MILE MARKER 163 EMELLE AL 35459						U.S. EPA ID Number ALD000822464				
Facility's Phone: (205) 852-9721										
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))				10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
						No.	Type			
	X	1. RQ, UN3432, POLYCHLORINATED BIPHENYLS SOLID MIXTURE, 9, III						(EST)	K	(PCBs)
		CM8879				01	CM	13.500		
								10605		
	14. Special Handling Instructions and Additional Information 1. CM8879 ERG-171 OUT OF SERVICE DATE: 6/30/2021				P.O. # 46999234 PCB Labels 3432 Placards					
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.										
Generator's/Offor's Printed/Typed Name Andrew Wendt						Signature 		Month Day Year 6/30/21		
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:									
	17. Transporter Acknowledgment of Receipt of Materials									
	Transporter 1 Printed/Typed Name Demetrius Windham						Signature 		Month Day Year 6/30/21	
	Transporter 2 Printed/Typed Name						Signature		Month Day Year	
DESIGNATED FACILITY	18. Discrepancy									
	18a. Discrepancy Indication Space <input checked="" type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection									
	Corrected to recvd lot. Per Andrew D. Wendt 7/12/21 BW									
	18b. Alternate Facility (or Generator)						U.S. EPA ID Number			
	Facility's Phone:									
	18c. Signature of Alternate Facility (or Generator)						Month Day Year			
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)									
	1. H13a		2.		3.		4.			
	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a									
	Printed/Typed Name Tammy Thrash						Signature 		Month Day Year 7/8/21	



Chemical Waste Management
P.O. Box 55
36964 Alabama Hwy 17
Emelle, AL 35459-0055
(205)652-9721

SOLUTIA INC
702 CLYDESDALE AVE

ANNISTON,AL 36201-5328

Attn: MARK KNIGHTON

Site Information

SOLUTIA
702 CLYDESDALE AVE

ANNISTON,AL 36201-5328

ACKNOWLEDGEMENT OF RECEIPT OF WASTE SHIPMENT

Generator Name: SOLUTIA

Enclosed is/are your Generator Number Two copy / copies for Alabama Manifest Numbers:

003693645GBF

This copy is to acknowledge that Chemical Waste Management, Inc., of Emelle, Alabama has received your shipment. As a requirement of 40 CFR 264.12 (b), this letter serves to inform you that this facility has the proper permits and will accept your shipment upon completion of waste analysis procedures specified in the facility's Waste Analysis Plan and as determined in the approval waste profile submitted for this/these wastes.

As of September 26, 1997, Chemical Waste Management, Inc., Emelle Alabama (ALD000622464) is operating under a AHWMA Permit, issued by the Alabama Department of Environmental Management. (RCRA)

Al Talbott
Safety Manager

July 14, 2021



Chemical Waste Management
P.O. Box 55
36964 Alabama Hwy 17
Emelle, AL 35459-0055
(205)652-9721

Manifest Document Number:

SOLUTIA INC
702 CLYDESDALE AVE

ANNISTON, AL 36201-5328
Attn: MARK KNIGHTON

Site Information

SOLUTIA
702 CLYDESDALE AVE

ANNISTON, AL 36201-5328

CERTIFICATE OF DISPOSAL

Chemical Waste Management, Inc. (ALD000622464) has received PCB material from
SOLUTIA

as described on Hazardous Waste Manifest Number 003693645GBF-1

Waste Management, Inc. hereby certifies that the above described material (excluding PCB liquids, if applicable) was
landfilled on the dates shown below, in compliance with State and Federal Regulations.

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or
representation (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this
document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally
verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting
under my direct instructions, made the verification that this information is true, accurate and complete.

AC Talbott/cm
Al Talbott, Safety Manager
July 14, 2021

OSD	Unique ID	Cont #	Profile	Disposed	Description
6/30/21	003693645GBF-01	1	CM9879	7/8/21	ANNISTON PCB SITE CONSENT DECR

(Seth Lowyck)

Box # 25445 / Tractor # 2015

Form Approved, OMB No. 2050-0039

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)



Chemical Waste Management
P.O. Box 55
36964 Alabama Hwy 17
Emelle, AL 35459-0055
(205)652-9721

SOLUTIA INC
702 CLYDESDALE AVE

ANNISTON,AL 36201-5328
Attn: MARK KNIGHTON

Site Information

SOLUTIA
702 CLYDESDALE AVE

ANNISTON,AL 36201-5328

ACKNOWLEDGEMENT OF RECEIPT OF WASTE SHIPMENT

Generator Name: SOLUTIA
Enclosed is/are your Generator Number Two copy / copies for Alabama Manifest Numbers:

003693646GBF

This copy is to acknowledge that Chemical Waste Management, Inc., of Emelle, Alabama has received your shipment. As a requirement of 40 CFR 264.12 (b), this letter serves to inform you that this facility has the proper permits and will accept your shipment upon completion of waste analysis procedures specified in the facility's Waste Analysis Plan and as determined in the approval waste profile submitted for this/these wastes.

As of September 26, 1997, Chemical Waste Management, Inc., Emelle Alabama (ALD000622464) is operating under a AHWMA Permit, issued by the Alabama Department of Environmental Management. (RCRA)

Al Talbott
Safety Manager

September 03, 2021

WM
Chemical Waste Management
P.O. Box 55
36964 Alabama Hwy 17
Emelle, AL 35459-0055
(205)652-9721

Manifest Document Number:

SOLUTIA INC
702 CLYDESDALE AVE

ANNISTON, AL 36201-5328
Attn: MARK KNIGHTON

Site Information

SOLUTIA
702 CLYDESDALE AVE

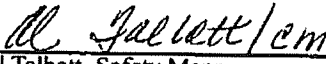
ANNISTON, AL 36201-5328

CERTIFICATE OF DISPOSAL

Chemical Waste Management, Inc. (ALD000622464) has received PCB material from
SOLUTIA

as described on Hazardous Waste Manifest Number 003693646GBF-I
Waste Management, Inc. hereby certifies that the above described material (excluding PCB liquids, if applicable) was
landfilled on the dates shown below, in compliance with State and Federal Regulations.

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or
representation (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this
document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally
verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting
under my direct instructions, made the verification that this information is true, accurate and complete.


Al Talbott, Safety Manager
September 03, 2021

OSD	Unique ID	Cont #	Profile	Disposed	Description
8/17/21	003693646GBF-01	1	CM9879	8/19/21	ANNISTON PCB SITE CONSENT DECR

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
	GBF			
5. Generator's Name and Mailing Address		Generator's Site Address (if different than mailing address)		
Generator's Phone:		U.S. EPA ID Number		
6. Transporter 1 Company Name		U.S. EPA ID Number		
7. Transporter 2 Company Name		U.S. EPA ID Number		
8. Designated Facility Name and Site Address		U.S. EPA ID Number		
Facility's Phone:				
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers	11. Total Quantity	12. Unit Wt./Vol.
		No.	Type	13. Waste Codes
1.				
2.				
3.				
4.				
14. Special Handling Instructions and Additional Information				
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.				
Generator's/Offor's Printed/Typed Name:		Signature		Month Day Year
16. International Shipments		Port of entry/exit:		Date leaving U.S.:
17. Transporter Acknowledgment of Receipt of Materials		Signature		Month Day Year
18. Discrepancy		Signature		Month Day Year
18a. Discrepancy Indication Space		Manifest Reference Number:		U.S. EPA ID Number
18b. Alternate Facility (or Generator)		Signature		Month Day Year
18c. Signature of Alternate Facility (or Generator)		Signature		Month Day Year
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)		Signature		Month Day Year
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a		Signature		Month Day Year



Chemical Waste Management
P.O. Box 55
36964 Alabama Hwy 17
Emelle, AL 35459-0055
(205)652-9721

Site Information

SOLUTIA INC
702 CLYDESDALE AVE

ANNISTON,AL 36201-5328

SOLUTIA
702 CLYDESDALE AVE

ANNISTON,AL 36201-5328

ACKNOWLEDGEMENT OF RECEIPT OF WASTE SHIPMENT

Generator Name: SOLUTIA
Enclosed is/are your Generator Number Two copy / copies for Alabama Manifest Numbers:

003693647GBF

This copy is to acknowledge that Chemical Waste Management, Inc., of Emelle, Alabama has received your shipment. As a requirement of 40 CFR 264.12 (b), this letter serves to inform you that this facility has the proper permits and will accept your shipment upon completion of waste analysis procedures specified in the facility's Waste Analysis Plan and as determined in the approval waste profile submitted for this/these wastes.

As of September 26, 1997, Chemical Waste Management, Inc., Emelle Alabama (ALD000622464) is operating under a AHWMMA Permit, issued by the Alabama Department of Environmental Management. (RCRA)

Al Talbott
Safety Manager

October 14, 2021



Chemical Waste Management
P.O. Box 55
36964 Alabama Hwy 17
Emelle, AL 35459-0055
(205)652-9721

Manifest Document Number:

SOLUTIA INC
702 CLYDESDALE AVE

ANNISTON, AL 36201-5328

Site Information

SOLUTIA
702 CLYDESDALE AVE

ANNISTON, AL 36201-5328

CERTIFICATE OF DISPOSAL

Chemical Waste Management, Inc. (ALD000622464) has received PCB material from
SOLUTIA

as described on Hazardous Waste Manifest Number 003693647GBF-1

Waste Management, Inc. hereby certifies that the above described material (excluding PCB liquids, if applicable) was
landfilled on the dates shown below, in compliance with State and Federal Regulations.

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or
representation (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this
document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally
verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting
under my direct instructions, made the verification that this information is true, accurate and complete.

Al Talbott /cm

Al Talbott, Safety Manager

October 14, 2021

OSD	Unique ID	Cont #	Profile	Disposed	Description
10/4/21	003693647GBF-01	1	CM9879	10/5/21	ANNISTON PCB SITE CONSENT DECR

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number: <u>ALD 004019048</u>		2. Page 1 of <u>2</u>	3. Emergency Response Phone: <u>503/424-2000</u>	4. Manifest Tracking Number: <u>002330548</u> GBF			
5. Generator's Name and Mailing Address: <u>Schupp, Inc. 703 Lakeside Avenue Northwest, AL 36201-5328</u>					Generator's Site Address (if different than mailing address):				
Generator's Phone: <u>(256) 231-8100</u>									
6. Transporter 1 Company Name: <u>Robbie D. Wood, Inc.</u>					U.S. EPA ID Number: <u>ALD 067138891</u>				
7. Transporter 2 Company Name:					U.S. EPA ID Number:				
8. Designated Facility Name and Site Address: <u>ENVIRONMENTAL WASTE MANAGEMENT, INC. 10000 W. TROTHMAN LAKE PARKWAY S.W. ALBUQUERQUE, NM 87109</u>					U.S. EPA ID Number: <u>11 D00000000</u>				
Facility's Phone: <u>(505) 261-7777</u>									
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))			10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
					No.	Type			
	1.	POLYETHYLENE GLYCOL (PEG) POLYMER S/ SOLID WASTE, 100% PEG 400			01	CM	550		PCB
	2.						7971		
	3.								
14. Special Handling Instructions and Additional Information: <u>DO NOT OPEN OR STORE 10/4/21</u> <u>ALC # 46999234</u> <u>PCB Labels</u> <u>3432 Phosphate</u>									
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.									
Generator's/Offor's Printed/Typed Name: <u>Andrew Wondt</u>					Signature: <u>[Signature]</u>		Month Day Year: <u>10 4 21</u>		
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:								
	17. Transporter Acknowledgment of Receipt of Materials								
Transporter 1 Printed/Typed Name: <u>Lorenzo Brown</u>					Signature: <u>[Signature]</u>		Month Day Year: <u>10 4 21</u>		
Transporter 2 Printed/Typed Name:					Signature:		Month Day Year:		
DESIGNATED FACILITY	18. Discrepancy								
	18a. Discrepancy Indication Space <input checked="" type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection								
	<u>Corrected to recalculation</u> <u>Per Mike Price 10/8/21</u>								
	18b. Alternate Facility (or Generator):					U.S. EPA ID Number:			
	Facility's Phone:								
18c. Signature of Alternate Facility (or Generator):							Month Day Year:		
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)									
1. <u>H132</u>		2.		3.		4.			
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a									
Printed/Typed Name: <u>Amnette Wilson</u>					Signature: <u>[Signature]</u>		Month Day Year: <u>10 05 21</u>		



Chemical Waste Management
P.O. Box 55
36964 Alabama Hwy 17
Emelle, AL 35459-0055
(205)652-9721

SOLUTIA INC
702 CLYDESDALE AVE

ANNISTON,AL 36201-5328

Site Information

SOLUTIA
702 CLYDESDALE AVE

ANNISTON,AL 36201-5328

ACKNOWLEDGEMENT OF RECEIPT OF WASTE SHIPMENT

Generator Name: SOLUTIA

Enclosed is/are your Generator Number Two copy / copies for Alabama Manifest Numbers:

003693648GBF

This copy is to acknowledge that Chemical Waste Management, Inc., of Emelle, Alabama has received your shipment. As a requirement of 40 CFR 264.12 (b), this letter serves to inform you that this facility has the proper permits and will accept your shipment upon completion of waste analysis procedures specified in the facility's Waste Analysis Plan and as determined in the approval-waste profile submitted for this/these wastes.

As of September 26, 1997, Chemical Waste Management, Inc., Emelle Alabama (ALD000622464) is operating under a AHWMA Permit, issued by the Alabama Department of Environmental Management. (RCRA)

Al Talbott
Safety Manager

October 14, 2021



Chemical Waste Management
P.O. Box 55
36964 Alabama Hwy 17
Emelle, AL 35459-0055
(205)652-9721

Manifest Document Number:

SOLUTIA INC
702 CLYDESDALE AVE

ANNISTON, AL 36201-5328

Site Information

SOLUTIA
702 CLYDESDALE AVE

ANNISTON, AL 36201-5328

CERTIFICATE OF DISPOSAL

Chemical Waste Management, Inc. (ALD000622464) has received PCB material from
SOLUTIA

as described on Hazardous Waste Manifest Number 003693648GBF-1

Waste Management, Inc. hereby certifies that the above described material (excluding PCB liquids, if applicable) was
landfilled on the dates shown below, in compliance with State and Federal Regulations.

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or
representation (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this
document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally
verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting
under my direct instructions, made the verification that this information is true, accurate and complete.

Al Talbott, Safety Manager
October 14, 2021

OSD	Unique ID	Cont #	Profile	Disposed	Description
10/4/21	003693648GBF-01	1	CM9879	10/5/21	ANNISTON PCB SITE CONSENT DECR

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number <i>11132</i>	2. Page 1 of <i>1</i>	3. Emergency Response Phone <i>602-231-8600</i>	4. Manifest Tracking Number <i>0083332248</i>	GBF
5. Generator's Name and Mailing Address <i>Solstice, Inc. 723 E. Highland Ave. Tucson, AZ 85710-3300</i>			Generator's Site Address (if different than mailing address)			
Generator's Phone: <i>602-231-8600</i>						
6. Transporter 1 Company Name <i>Robbie D. Wood, Inc.</i>			U.S. EPA ID Number <i>AL0000138891</i>			
7. Transporter 2 Company Name			U.S. EPA ID Number			
8. Designated Facility Name and Site Address <i>DESIGNATED FACILITY FOR HAZARDOUS WASTE AND SOLID WASTE TREATMENT, STORAGE AND DISPOSAL</i>			U.S. EPA ID Number <i>11132</i>			
Facility's Phone: <i>602-231-8600</i>						
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
1.	<i>20. DANGER, POISON - LIQUID CORROSIVE WASTE - UNIDENTIFIED</i>	<i>01</i>	<i>UN</i>	<i>6996</i>		<i>(P123)</i>
2.						
3.						
4.						
14. Special Handling Instructions and Additional Information <i>10/13/21</i> <i>PA # 46909234</i> <i>ECB Inlets</i> <i>State of Origin - AL 8482 Placards</i>						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Offeror's Printed/Typed Name <i>Andrew Wood</i>			Signature <i>[Signature]</i>		Month Day Year <i>10 13 21</i>	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:						
17. Transporter Acknowledgment of Receipt of Materials						
Transporter 1 Printed/Typed Name <i>Robbie D. Wood</i>			Signature <i>[Signature]</i>		Month Day Year <i>10 13 21</i>	
Transporter 2 Printed/Typed Name			Signature		Month Day Year	
18. Discrepancy						
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
Add Receipt with Manifest Reference Number:						
18b. Alternate Facility (or Generator)			U.S. EPA ID Number			
Facility's Phone:						
18c. Signature of Alternate Facility (or Generator)			Signature		Month Day Year	
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1.	2.	3.	4.			
<i>11132</i>						
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
Printed/Typed Name <i>Annette Wilson</i>			Signature <i>[Signature]</i>		Month Day Year <i>10 19 21</i>	



Chemical Waste Management
P.O. Box 55
36964 Alabama Hwy 17
Emelle, AL 35459-0055
(205)652-9721

Site Information

SOLUTIA INC
702 CLYDESDALE AVE

ANNISTON,AL 36201-5328

SOLUTIA
702 CLYDESDALE AVE

ANNISTON,AL 36201-5328

ACKNOWLEDGEMENT OF RECEIPT OF WASTE SHIPMENT

Generator Name: SOLUTIA
Enclosed is/are your Generator Number Two copy / copies for Alabama Manifest Numbers:

003693649GBF

This copy is to acknowledge that Chemical Waste Management, Inc., of Emelle, Alabama has received your shipment. As a requirement of 40 CFR 264.12 (b), this letter serves to inform you that this facility has the proper permits and will accept your shipment upon completion of waste analysis procedures specified in the facility's Waste Analysis Plan and as determined in the approval waste profile submitted for this/these wastes.

As of September 26, 1997, Chemical Waste Management, Inc., Emelle Alabama (ALD000622464) is operating under a AHWMMA Permit, issued by the Alabama Department of Environmental Management. (RCRA)

Al Talbott
Safety Manager

October 20, 2021

WM

Chemical Waste Management
P.O. Box 55
36964 Alabama Hwy 17
Emelle, AL 35459-0055
(205)652-9721

Manifest Document Number:

SOLUTIA INC
702 CLYDESDALE AVE

ANNISTON, AL 36201-5328

Site Information

SOLUTIA
702 CLYDESDALE AVE

ANNISTON, AL 36201-5328

CERTIFICATE OF DISPOSAL

Chemical Waste Management, Inc. (ALD000622464) has received PCB material from
SOLUTIA

as described on Hazardous Waste Manifest Number 003693649GBF-1

Waste Management, Inc. hereby certifies that the above described material (excluding PCB liquids, if applicable) was
landfilled on the dates shown below, in compliance with State and Federal Regulations.

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or
representation (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this
document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally
verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting
under my direct instructions, made the verification that this information is true, accurate and complete.

Al Talbott /cm

Al Talbott, Safety Manager

October 20, 2021

OSD	Unique ID	Cont #	Profile	Disposed	Description
10/13/21	003693649GBF-01	1	CM9879	10/19/21	ANNISTON PCB SITE CONSENT DECR



Requested Facility: CWM Emelle (Hazardous Waste Facility) ☐ Unsure Profile Number: CM9879
☐ Multiple Generator Locations (Attach Locations) ☒ Request Certificate of Disposal ☒ Renewal? Original Profile Number: CM9879

A. GENERATOR INFORMATION (MATERIAL ORIGIN)

1. Generator Name: Anniston PCB Site (Solutia)
2. Site Address: 702 Clydesdale Ave.
(City, State, ZIP) Anniston AL 36201
3. County: _____
4. Contact Name: Mike Price
5. Email: mprice@genproject.com
6. Phone: (256) 231-8412 7. Fax: _____
8. Generator EPA ID: ALD004019048 ☐ N/A
9. State ID: _____ ☒ N/A

C. MATERIAL INFORMATION

1. Common Name: Anniston PCB Site Consent Decree Waste
Describe Process Generating Material: ☐ See Attached
US EPA Consent Decree Anniston PCB site - Various Locations - Source of PCBs is Unknown
2. Material Composition and Contaminants: ☐ See Attached

1. Soil	95-100 %
2. ppe, wood, glass, plastic, concrete, brick	0-5 %
3. non-haz scrap metal	0-5 %
4. PCBs	0-300 mg/kg
Total comp. must be equal to or greater than 100%	≥100%

3. State Waste Codes: _____ ☒ N/A
4. Color: varies
5. Physical State at 70°F: ☒ Solid ☐ Liquid ☐ Other: _____
6. Free Liquid Range Percentage: _____ to _____ ☒ N/A
7. pH: _____ to _____ ☒ N/A
8. Strong Odor: ☐ Yes ☒ No Describe: _____
9. Flash Point: ☐ <140°F ☐ 140°–199°F ☒ ≥200° ☒ N/A

E. ANALYTICAL AND OTHER REPRESENTATIVE INFORMATION

1. Analytical attached ☐ Yes
Please identify applicable samples and/or lab reports:

2. Other information attached (such as MSDS)? ☐ Yes

G. GENERATOR CERTIFICATION (PLEASE READ AND CERTIFY BY SIGNATURE)

By signing this EZ Profile™ form, I hereby certify that all information submitted in this and all attached documents contain true and accurate descriptions of this material, and that all relevant information necessary for proper material characterization and to identify known and suspected hazards has been provided. Any analytical data attached was derived from a sample that is representative as defined in 40 CFR 261 – Appendix 1 or by using an equivalent method. All changes occurring in the character of the material (i.e., changes in the process or new analytical) will be identified by the Generator and be disclosed to Waste Management prior to providing the material to Waste Management.

☐ I am an Authorized Agent signing on behalf of the Generator, and I have confirmed with the Generator that information contained in this profile, as well as supporting documents provided, are accurate and complete.

Name (Print): Mark Knighton Date: 04/07/2020
Title: HSE&S Specialist
Company: Solutia, a Subsidiary of Eastman Chemical

THINK GREEN.®**B. BILLING INFORMATION**☒ SAME AS GENERATOR

1. Billing Name: Anniston PCB Site (Solutia)
2. Billing Address: 702 Clydesdale Ave.
(City, State, ZIP) Anniston AL 36201
3. Contact Name: Mike Price
4. Email: mprice@genproject.com
5. Phone: (256) 231-8412 6. Fax: _____
7. WM Hauled? ☐ Yes ☐ No
8. P.O. Number: _____
9. Payment Method: ☐ Credit Account ☐ Cash ☐ Credit Card

D. REGULATORY INFORMATION

1. EPA Hazardous Waste? ☐ Yes* ☒ No
Code: _____
2. State Hazardous Waste? ☐ Yes ☒ No
Code: _____
3. Is this material non-hazardous due to Treatment, Delisting, or an Exclusion? ☐ Yes* ☒ No
4. Contains Underlying Hazardous Constituents? ☐ Yes* ☒ No
5. From an industry regulated under Benzene NESHAP? ☐ Yes* ☒ No
6. Facility remediation subject to 40 CFR 63 GGGGG? ☐ Yes* ☒ No
7. CERCLA or State-mandated clean-up? ☐ Yes* ☒ No
8. NRC or State-regulated radioactive or NORM waste? ☐ Yes* ☒ No
***If Yes, see Addendum (page 2) for additional questions and space.**
9. Contains PCBs? → If Yes, answer a, b and c. ☒ Yes ☐ No
a. Regulated by 40 CFR 761? ☒ Yes ☐ No
b. Remediation under 40 CFR 761.61 (a)? ☐ Yes ☒ No
c. Were PCB imported into the US? ☐ Yes ☒ No
10. Regulated and/or Untreated Medical/Infectious Waste? ☐ Yes ☒ No
11. Contains Asbestos? ☐ Yes ☒ No
→ If Yes: ☐ Non-Friable ☐ Non-Friable – Regulated ☐ Friable

F. SHIPPING AND DOT INFORMATION

1. ☐ One-Time Event ☒ Repeat Event/Ongoing Business
2. Estimated Quantity/Unit of Measure: 500
☒ Tons ☐ Yards ☐ Drums ☐ Gallons ☐ Other: _____
3. Container Type and Size: Roll off
4. USDOT Proper Shipping Name: _____ ☒ N/A

Certification SignatureMark Knighton



Only complete this Addendum if prompted by responses on EZ Profile™ (page 1) or to provide additional information. Sections and question numbers correspond to EZ Profile™.

Profile Number: CM9879

C. MATERIAL INFORMATION

Describe Process Generating Material (Continued from page 1):

If more space is needed, please attach additional pages.

Material Composition and Contaminants (Continued from page 1):

If more space is needed, please attach additional pages.

5. Lead		0-2000 mg/kg
6. TCLP Lead		0-4.9 mg/l
7.		
8.		
9.		
Total composition must be equal to or greater than 100%		≥100%

D. REGULATORY INFORMATION

Only questions with a "Yes" response in Section D on the EZ Profile™ form (page 1) need to be answered here.

1. EPA Hazardous Waste

a. Please list all USEPA listed and characteristic waste code numbers:

b. Is the material subject to the Alternative Debris standards (40 CFR 268.45)?

☐ Yes ☐ No

c. Is the material subject to the Alternative Soil standards (40 CFR 268.49)? → If Yes, complete question 4.

☐ Yes ☐ No

d. Is the material exempt from Subpart CC Controls (40 CFR 264.1083)?

☐ Yes ☐ No

→ If Yes, please check **one** of the following:

☐ Waste meets LDR or treatment exemptions for organics (40 CFR 264.1082(c)(2) or (c)(4))

☐ Waste contains VOCs that average <500 ppmw (CFR 264.1082(c)(1)) – will require annual update.

2. State Hazardous Waste → Please list all state waste codes: _____

3. For material that is Treated, Delisted, or Excluded → Please indicate the category, below:

☐ Delisted Hazardous Waste

☐ Excluded Waste under 40 CFR 261.4 → Specify Exclusion: _____

☐ Treated Hazardous Waste Debris

☐ Treated Characteristic Hazardous Waste → If checked, complete question 4.

4. Underlying Hazardous Constituents → Please list all Underlying Hazardous Constituents:

5. Industries regulated under Benzene NESHAP include petroleum refineries, chemical manufacturing plants, coke by-product recovery plants, and TSDFs.

a. Are you a TSDF? → If yes, please complete Benzene NESHAP questionnaire. If not, continue.

☐ Yes ☐ No

b. Does this material contain benzene?

☐ Yes ☐ No

1. If yes, what is the flow weighted average concentration?

_____ ppmw

c. What is your facility's current total annual benzene quantity in Megagrams?

☐ <1 Mg ☐ 1–9.99 Mg ☐ ≥10 Mg

d. Is this waste soil from a remediation?

☐ Yes ☐ No

1. If yes, what is the benzene concentration in remediation waste?

_____ ppmw

e. Does the waste contain >10% water/moisture?

☐ Yes ☐ No

f. Has material been treated to remove 99% of the benzene or to achieve <10 ppmw?

☐ Yes ☐ No

g. Is material exempt from controls in accordance with 40 CFR 61.342?

☐ Yes ☐ No

→ If yes, specify exemption: _____

h. Based on your knowledge of your waste and the BWON regulations, do you believe that this waste stream is subject to treatment and control requirements at an off-site TSDF?

☐ Yes ☐ No

6. 40 CFR 63 GGGGG → Does the material contain <500 ppmw VOHAPs at the point of determination?

☐ Yes ☐ No

7. CERCLA or State-Mandated clean up → Please submit the Record of Decision or other documentation with process information to assist others in the evaluation for proper disposal. A "Determination of Acceptability" may be needed for CERCLA wastes not going to a CERCLA approved facility.

8. NRC or state regulated radioactive or NORM Waste → Please identify Isotopes and pCi/g: _____

WELL ABANDONMENT REPORT

Solutia, Inc., Anniston, Alabama
RCRA Post-Closure Permit ALD 004 019 048
Consent Decree Docket No. 1:02-ec-0749-KOB

APPENDIX D: VARIANCE NOTICE DOCUMENTATION

Travis McGuire

From: Duites, Metz <MPD@adem.alabama.gov>
Sent: Thursday, June 17, 2021 1:20 PM
To: Travis McGuire
Subject: RE: Solutia Anniston - Well Decommissioning - Request for Variances

Acknowledging.

Metz

From: Travis McGuire <tmmcguire@gsi-net.com>
Sent: Thursday, June 17, 2021 12:30 PM
To: Duites, Metz <MPD@adem.alabama.gov>
Cc: Gayle Macolly <egmaco@eastman.com>; John Loper <jloper@lopergroup.com>; Michael Price <mprice@genproject.com>
Subject: Solutia Anniston - Well Decommissioning - Request for Variances
Importance: High

Hello Metz,

Thanks for speaking with me this morning regarding three situations we've encountered on the Solutia Anniston well decommissioning field work. A brief summary is provided below, along with our proposed solution. Please let us know if ADEM concurs with the approach or if there are any questions or alternative approaches we need to consider.

1. **Four monitoring wells within HDPE Liner at the South Landfill:** As shown on the attached map, there are 2 monitoring wells (OW-11 and OW-12) that are well within the boundary of the HDPE liner – and two additional wells (UP-001 and OW-17) that are very near the edge of the HDPE liner. Based on our review of construction photos during installation of the liner, the toe of the liner extends very close to the road on the north side of these wells. As such, there is a high likelihood they are within the liner boundary. To prevent potential damage to the landfill liner, we are requesting a variance to grout these four wells in place in lieu of over drilling. A provision to request a variance for grout-in-place was included in the RCRA Permit Application at Part B, Section 6, Attachment 6.4.
2. **Eight monitoring wells within Soil Covers:** Four of the wells (OW-5, OW-16, PZR-05, PZR-06) are located at the Walking Trail Area and the other four wells (SBP-03, MW-07, OWR-04D, DOP-01) are located north of WMA-II. At these locations, there is a vegetation layer and 14" soil cover overlying impacted soils. A geofabric marker is present between the soil cover and impacted soils. We are proposing to decommission these wells as follows:
 - a. hand excavate down to the geofabric marker, placing the clean soil on plastic for later replacement
 - b. over drill the monitoring well
 - c. grout to within 2 feet of the geofabric marker
 - d. place a 2-ft cement plug up to the elevation of the geofabric marker
 - e. place new geofabric marker on top of the cement plug

- f. replace the soil cover on top of the geofabric marker
- 3. **Augers lost in borehole of PZ-09:** After over drilling to the total depth of 55 feet at well PZ-09 located in the WMA-II area, 40 feet of hollow stem auger drill string fell into the borehole. The driller has made several attempts to recover the augers and is currently fabricating a custom retrieval tool to make one more attempt at recovery. If unsuccessful, the augers will be grouted in place. We will keep ADEM updated on the outcome.

The second of four 10-day field mobilizations is schedule to be completed June 21-30.

Thanks,
Travis

Travis McGuire, P.E. | Vice President & Principal Engineer | GSI Environmental Inc.

2211 Norfolk St., Suite 1000 | Houston, Texas | 77098

T: 713-522-6300 | C: 832-687-0743

<http://www.gsi-net.com> | [Connect on LinkedIn](#)

TX PE No. 108754 | OK PE No. 27436



Travis McGuire

From: Duites, Metz <MPD@adem.alabama.gov>
Sent: Tuesday, June 29, 2021 3:04 PM
To: Travis McGuire
Cc: Gayle Macolly; Pierce, Austin R; John Loper; Michael Price; Ben Smith; Reeves, Wade D
Subject: RE: Solutia Anniston - Well Decommissioning - Request for Variances

Thank you for the continued update, Travis!

Metz

From: Travis McGuire <tmmcguire@gsi-net.com>
Sent: Tuesday, June 29, 2021 9:13 AM
To: Duites, Metz <MPD@adem.alabama.gov>
Cc: Gayle Macolly <egmaco@eastman.com>; Pierce, Austin R <austin.pierce@adem.alabama.gov>; John Loper <jloper@lopergroup.com>; Michael Price <mprice@genproject.com>; Ben Smith <WBSmith@gsi-net.com>
Subject: RE: Solutia Anniston - Well Decommissioning - Request for Variances
Importance: High

Good morning Metz,

We encountered an issue yesterday afternoon while over-drilling OWR-2D that, in our opinion, necessitates in-place grouting of the borehole. The issue is summarized below. Please let us know if there are any comments or concerns with the proposed variance.

Issue: A subsurface void was encountered between 70 and 75 feet below ground surface while drilling using air rotary. The issue manifested through loss of cuttings return to the surface and presence of compressed air escaping to ground surface approximately 10 feet from the borehole. Review of the boring log for OWR-2D indicates this void was also encountered during well installation at the same depth interval (see Note on page 2 of attached file).

Response Actions: The drilling foreman (Joe Tillman with EFS) advised the drill crew to remove the drill string from the borehole to prevent cuttings from piling up on top of the string and potentially getting it stuck. The crew then attempted to run the grout tremie pipe into the borehole to determine if it could get to the well's total depth of 110 feet. The tremie pipe met refusal at 40 feet.

Recommendation: Discussion of options for continued over-drilling with Mr. Tillman indicated a significant risk of losing the drill string (with either air rotary or auger drilling) due to the possibility for PVC fragments and cuttings to accumulate in the void, then seize the drill string. Due to the significant risk of losing the drill string, we determined the best course of action for this well is to grout in-place. We plan to begin grouting after lunch today.

Please feel free to call my cell phone if you would like to discuss.

Thanks,
Travis | 832.687.0743 (cell)

Travis McGuire

From: Duites, Metz <MPD@adem.alabama.gov>
Sent: Friday, September 24, 2021 3:09 PM
To: Travis McGuire
Subject: RE: Solutia Anniston - Well Decommissioning

Thank you for the update Travis!

Metz

From: Travis McGuire <tmmcguire@gsi-net.com>
Sent: Friday, September 24, 2021 1:10 PM
To: Duites, Metz <MPD@adem.alabama.gov>
Cc: Reeves, Wade D <wade.reeves@adem.alabama.gov>; John Loper <jloper@lopergroup.com>; Michael Price <mprice@genproject.com>; Thomas Loper <tloper@lopergroup.com>; Hopper, Jerry O - Contractor <johopp@eastman.com>; Josh Threadgill <jthreadgill@genproject.com>; Ben Smith <WBSmith@gsi-net.com>; Gayle Macolly <egmaco@eastman.com>; Pierce, Austin R <austin.pierce@adem.alabama.gov>
Subject: Solutia Anniston - Well Decommissioning
Importance: High

Hello again Metz,

This week Solutia resumed the well decommissioning program at the Anniston facility following a break in the project for several weeks due to scheduling conflicts. We are nearing completion of the project and much of the remaining work is focused on removal of surface isolation casings.

We've encountered a problem with removal of 10" diameter surface casings that are installed at 13 of the remaining well locations. The drilling contractor, EFS (Toney, AL), had to rent 12.5" diameter hollow stem augers in order to attempt over-drilling these casings. Once on-site, it was found that the outer diameter of these large augers is not accommodated by the CME drilling rig (see photo attached), and EFS does not have other drill rigs that can accommodate these large augers. As such, Solutia plans to grout-in-place these surface casings using pressurized delivery. The grout-in-place alternative was provided for in the most recent RCRA Permit Application (PDF page 24 of Volume 1), an excerpt of which is provided below. Note that the well casings at all 13 of these wells were successfully over-drilled to total depth and pressure grouted to the base of the surface casing.

The removal of monitoring well risers, monitoring well screens, and outer casings is dependent on the size, alignment, and condition of these materials. In the event that a well casing is removed through over drilling, ADEM will be notified and the casing will be grouted in place.

The grouting of these surface cases is planned for next Monday through Wednesday (9/27-29).

Please let us know if ADEM has any questions or concerns.